

THE LAW OFFICES OF
JOSEPH Z. AMSEL, PLLC

ATTORNEY AT LAW

43 WEST 43RD STREET, SUITE 265, NEW YORK, NY 10036

TELEPHONE: 888-558-7425 FAX: 212-437-9844

EMAIL: JZAMSEL@AMSELLAW.COM WEB: WWW.AMSELLAW.COM

April 11, 2022

The Honorable Denis R. Hurley
United States District Court for the
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re Notice of Compliance with Court’s “Bundle” Rule and Filing Under Seal, *Geis v. Delahunt*, 2:20-cv-03834-DRH-JMW

Dear Judge Hurley:

I write to inform the Court that, consistent with the Court’s “Bundle Rule,” *see* Individual Practice 3.F, the parties have fully briefed the motion vacate the certificate of default in this matter. Courtesy copies of the papers will be mailed to the Court as well.

Although not filed separately, one of the branches of Defendant’s motion seeks to seal the filings related to this motion. Because the portions of the filings that the parties agree should be sealed are inextricably intertwined with the portions of the filings of both parties that need not be sealed, Defendant has respectfully filed all documents under seal pending the Court’s disposition of this branch of the motion.

Respectfully submitted,

/s/ Joseph Z. Amsel, Esq.

To All Appearing Counsel Via ECF